

AFFIDAVIT

I, Thomas Howell, being duly sworn, depose and state as follows:

1. I am a Task Force Officer (TFO) with Homeland Security Investigations (HSI).

HSI is a directorate within Immigration and Customs Enforcement (ICE). ICE is a subordinate component of the Department of Homeland Security (DHS) and the successor to many of the law enforcement powers of the former Immigration and Naturalization Service and the former U.S. Customs Service. I have been a TFO for approximately one year and I am currently assigned to HSI Derby Line, Vermont. I am also a Detective Lieutenant with the Hartford (Vermont) Police Department (HPD) assigned to the Criminal Investigations Division and have been employed by HPD since 2014. I am responsible for working cases involving a variety of criminal violations to include technology and cybercrime, child exploitation, and child pornography, and have been the affiant for State of Vermont complaints related to these crimes. I have also investigated federal criminal violations related to these crimes. I have gained experience through training at the Vermont Police Academy and my work relating to conducting these types of investigations. I have had discussions with other law enforcement officers, including Vermont and New Hampshire Internet Crimes Against Children (ICAC) investigators and other HSI Special Agents, about how people use computers to commit crimes and the law enforcement techniques that can be utilized to investigate and disrupt such activity. I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

2. This Affidavit is offered to demonstrate that probable cause exists to believe that between November 10, 2024 and February 1, 2025, Matthew Isaacs employed, used, persuaded, induced, and coerced a minor, W.B., to engage in sexually explicit conduct for the purpose of

producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate commerce, in violation of 18 U.S.C. § 2251(a).

3. I have not set forth all the facts I have learned from my investigation into this matter. Rather, I have included those facts that I believe are sufficient to establish probable cause that Matthew Isaacs committed the foregoing offense. My knowledge comes from reviewing reports, affidavits, search warrants, and evidence in this matter, my own investigation, and my conversations with other law enforcement personnel.

PROBABLE CAUSE

4. Due to my previous investigation into this matter, I am aware that Matthew Isaacs lives at 34 Prospect Street, Apartment 203, Hartford, Vermont (the “Subject Premises”). On February 18, 2025, HPD Detective Eric Clifford began conducting an investigation into Matthew Isaacs for Lewd and Lascivious Conduct with a Child. On March 21, 2025 Matthew Isaacs was arrested on State of Vermont charges of Lewd and Lascivious Conduct with Child in violation of 13 VSA 2602 while at his residence and a State of Vermont search warrant was also executed immediately following his arrest. A true and correct copy of the State of Vermont charging affidavit authored by Detective Clifford is attached hereto as Exhibit 1 and incorporated here in its entirety.

5. As set forth in more detail in Exhibit 1, HPD’s investigation revealed probable cause that Isaacs had sexually abused W.B., a 5-year-old female child living in his apartment building. During the search of the Subject Premises detailed in Exhibit 1, officers discovered electronic devices. The located devices included a Blu cellphone and Revoview cellphone, and these “Suspect Devices” were subsequently seized. On March 24, 2025, a State of Vermont search warrant was granted authorizing the search of the Suspect Devices for evidence related to the State of Vermont charges. During this execution of the warrant, child pornography was

observed on the Suspect Devices. Another State of Vermont search warrant was thereafter sought related to child pornography violations, and subsequently granted. This second search warrant was then executed by HPD Detective Clifford, who is assigned to conducting digital forensic analysis of electronic devices.

6. During a forensic examination of the Blu cellphone (which are manufactured outside the State of Vermont), several user attributions identified the phone as belonging to Matthew Isaacs. These included the home screen being a photograph of Matthew Issacs; the Facebook application on the phone being the known profile for Isaacs; several photographs of Isaacs located on the phone; the Google account linked to the phone being “mattisaacs100@gmail.com”; and messaging on the phone attributable to Isaacs. During the analysis of the cellphone, HPD Detective Clifford located files of suspected child sexual abuse material. I have reviewed these image files and believe some of them depict child pornography as defined by federal law. Additional files, although not child pornography, depict sexualized images of W.B. Of note, the file names beginning with “.trashed” indicate the file had been previously deleted and was recovered by the digital forensics tool used by Detective Clifford.

a. File Name: .trashed-1743912571-Screenshot_2025-03-06-23-06-18.png

- i. This file depicts a modified/edited version of a photograph of W.B. with the photo modified/edited to show W.B. (a 5-year-old girl) with adult breasts.

b. File Name: .trashed-1743747746-Screenshot_2025-03-05-01-16-31.png

- i. This file depicts a modified/edited version of a photograph of W.B. with the photo modified/edited to show W.B. (a 5-year-old girl) with adult breasts.

c. File Name: .trashed-1743747751-Screenshot_2025-02-23-21-36-57~2.png

- i. This file depicts the prepubescent genitalia of a white juvenile. The focus of the image appears to be on the vaginal area. The juvenile is wearing a pink shirt and white bottoms with blue and pink stripes.

d. File Name: .trashed-1743747759-Screenshot_2025-02-23-21-36-57.png

- i. This file depicts prepubescent genitalia of a white juvenile. The focus of the image appears to be on the vaginal area.

e. File Name: .trashed-1742957125-IMG_20250223_213516.jpg

- i. This file appears to be an edited version of file .trashed-1743747751-Screenshot_2025-02-23-21-36-57~2.pn. This image depicts prepubescent genitalia of a white juvenile. The juvenile is wearing a pink shirt. Added into the photo is a cropped image of an erect penis pointing towards the vaginal area and being close to it. There is a white explosion symbol at the end of the penis, appearing to be directed towards the vaginal area.

f. File Name: .trashed-1742961206-IMG_20250223_212627.jpg]

- i. This file appears to be an edited version of .trashed-1743747759-Screenshot_2025-02-23-21-36-57.png. This image depicts prepubescent genitalia of a white female juvenile. Written in white color above the genitalia is W.B.'s first name and written in pink color below the genitalia opening is the word "Pussy." The juvenile is wearing a pink shirt and white bottoms with blue and pink stripes.

g. File name: .trashed-1742957124 IMG_20250223_213527.jpg

- i. This file depicts an unclothed buttocks of a white juvenile wearing jeans. The jeans appear to be pulled back, exposing the buttocks. The focus of the image appears to be on the unclothed buttocks.
- 7. During a forensic examination of the Revoview cellphone (which are manufactured outside the State of Vermont), several user attributions identified the phone as belonging to Matthew Isaacs. These included messages stating: “It’s Matthew on other phone”; and photographs of Isaacs. During the analysis of the cellphone, HPD Detective Clifford located files of suspected child pornographic material. Several of these files were located in a stored album titled “Cece [W.B.’s first name] an Iris”. Iris is the name of W.B.’s sibling, and “Cece” is believed to be Cecelia Brooner, W.B.’s mother. I have reviewed several of these image files and believe they are child pornography as defined in federal law.
 - a. File Name: IMG_20241227_193410.jpg
 - i. This file depicts prepubescent genitalia of a white juvenile. The juvenile is wearing a pink shirt and white bottoms with blue and pink stripes. This image was found stored in an album titled “Cece [W.B.’s first name] an Iris”.
 - b. File Name: IMG_20250118_213534~2.jpg
 - i. This file depicts prepubescent genitalia of a white juvenile. A picture of an erect penis is added to the image. At the end of the erect penis is a white explosion image, directed towards the prepubescent vaginal area. This image was found stored in an album titled “Cece [W.B.’s first name] an Iris.”

c. File Name:

167aef26dc63516c56593c072e23875306abbace4af6bea46c76502c01c9a88f.0

- i. This file depicts prepubescent genitalia of a white female. The juvenile is wearing a pink shirt and white bottoms with blue and pink stripes.

d. File Name:

38232996c47d95638c6e8461451cc40b0456aa9f454a6357dd0e039a0ddeeb4.0

- i. This file depicts prepubescent genitalia of a white juvenile. W.B.'s first name is written above the genitalia in white and the word "Pussy" is written in pink below the vaginal area. The juvenile is wearing a pink shirt and white bottoms with blue and pink stripes.

e. File Name: 234_reduced.jpg

- i. This file depicts a screenshot of a photo gallery and includes prepubescent genitalia and buttocks. The depicted juvenile is wearing a pink shirt and white bottoms with blue and pink stripes.

f. File Name: conversation_5_message_247_part_244_.bin

- i. This file is approximately 39 seconds long. This file type is labeled as a video and depicts a slideshow of several photos. The video starts with an anime photo of a female in purple lingerie, then transitions to a picture of prepubescent genitalia, to an erect penis, back to the image of prepubescent genitalia with an erect penis added to the image. The erect penis is directed at the vaginal area with a white explosion symbol. The image appears to repeat and about halfway through, an image of an apparent prepubescent genitalia with "[W.B.'s first name] Pussy" is seen

followed by another erect penis and a picture of W.B. lying down. The end of the video displays apparent adult genitalia. The depicted juvenile is wearing a pink shirt and white bottoms with blue and pink stripes.

g. File Name: VID_20250223_230107~2.mp4

- i. This file is approximately 36 seconds long. This file is labeled as a video and appears to be a slideshow of several images of prepubescent genitalia, to an erect penis and continues to repeat. The video was found in an album titled "Cece [W.B.'s first name] an Iris." The juvenile is wearing a pink shirt and white bottoms with blue and pink stripes.

8. During the analysis, messaging was noted between on or about 11/10/2024 and on or about 3/6/2025 in which the Subject Device sent and received picture messages including images of nude adult females and images of prepubescent genitalia. The other number in the conversation thread is one that publicly available records revealed the owner to be Matthew Isaacs. Also located on the Revoview cellphone was an image (File Name: IMG_20250109_231918.jpg) of W.B. wearing a tie-dyed Minnie Mouse shirt and blue jeans. W.B. is seated in a brown chair. The image depicts a person's arm down the front of the W.B.'s jeans in the area of the groin. The arm in the photograph has a partially visible tattoo on the forearm. This image was found stored in an album titled "Cece [W.B.'s first name] an Iris." Another image (File Name IMG_20250124_210718~2.jpg) depicts a white juvenile wearing a pink shirt and blue jeans. The jeans appear to be pulled back, exposing the buttocks. The focus of the image appears to be on the unclothed buttocks.
9. On April 3, 2025, law enforcement met with Cecelia Brooner at her residence to identify clothing depicted in the aforementioned files. Brooner confirmed that clothing depicted were

ones that belonged to W.B. Brooner located for law enforcement the white bottoms with blue and pink stripes depicted in many of the above-described photographs, and identified them as being W.B.'s. A brown chair was also photographed inside of the residence appearing to be the same brown chair described in paragraph eight where the adult arm was photographed as being down the front of W.B.'s pants. Brooner also identified the tattoo on the forearm depicted in that photograph as being consistent with a tattoo on Matthew Isaacs's forearm.

10. Based on the foregoing, I believe there is probable cause to believe that between November 10, 2024 and February 1, 2025, Matthew Isaacs employed, used, persuaded, induced, and coerced a minor, W.B., to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate commerce, in violation of 18 U.S.C. § 2251(a).

Dated at Burlington, in the District of Vermont, this 4th day of April, 2025.

/s/ Thomas Howell
Thomas Howell
Task Force Officer, HSI

Subscribed and sworn to in accordance with the requirements of Fed. R. Crim. P. 4.1 on this 4th day of April, 2025.

Judith Dein
Hon. Judith Dein
United States Magistrate Judge